| 1 2 3 4 | Michael P. Balaban State Bar No. 9370 LAW OFFICES OF MICHAEL P. BALABAN 10726 Del Rudini Street Las Vegas, NV 89141 (702)586-2964 Fax: (702)586-3023 | | |
|------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------|--|
| 5 | E-Mail: mbalaban@balaban-law.com | | |
| 6 | Attorney for Plaintiff | | |
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| 9 | UNITED STATES DISTRICT COURT | | |
| 10 | DISTRICT OF NEVADA | | |
| 11 | KAREN SHIELDS, |) CASE NO. 2:19-cv-00934-JAD-NJK | |
| 12 | in individuality, |) | |
| 13 | Plaintiff, | STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO DEFENDANT'S | |
| 14 | VS. |) MOTION TO DISMISS | |
| 15 | CREDIT ONE BANK, N.A.; CREDIT ONE |) (Second Request) | |
| 16 | FINANCIAL, a Nevada Corporation; SHERMAN FINANCIAL GROUP, LLC, a |) | |
| 17 | Delaware Limited Liability Company, |) | |
| 18 | Defendant. | | |
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| 20 | | | |
| 21 | | _) | |
| 22 | Pursuant to L.R. I.A. 6-1, 6-2, and 7-1, Defendant Credit One Bank, N.A. ("Defendant") | | |
| 23 | and Plaintiff Karen Shields ("Plaintiff") (collectively referred to as the "Parties"), by and through | | |
| 24 | their respective counsel of record, hereby stipulate and agree to extend the time for Plaintiff to | | |
| 25 | respond to Defendant's Motion to Dismiss, from September 13, 2019 to September 20, 2019. The | | |
| 26 | Parties also stipulate and agree to extend the time for Defendant to file its Reply in Support of its | | |
| 27 | Motion to Dismiss, from September 25, 2019 to September 30, 2019. The Parties are requestin | | |
| 28 | Tradion to Distinss, from September 23, 2017 t | o september 50, 2017. The fundes are requesting | |

| 1 | this extension due to Plaintiff's counsel having to respond to another motion to dismiss on | | |
|----------|-----------------------------------------------------------------------------------------------------|---------------------------------------------------|--|
| 2 | September 13, 2019. This is the Parties' second request to extend the time for Plaintiff to respond | | |
| 3 | to Defendant's Motion to Dismiss, and for Defendant to file its Reply in Support thereof. This | | |
| 4 | requested extension of time is sought in good faith and not for purposes of causing any undue | | |
| 5 | delay. | | |
| 6 | | | |
| 7 | IT IS SO STIPULATED. | | |
| 8 | Dated this 9th day of September, 2019. | | |
| 9 | LAW OFFICES OF MICHAEL D | OCLETREE DEAVING MACH | |
| 10 | LAW OFFICES OF MICHAEL P. BALABAN | OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C. | |
| 11 | | | |
| 12 | /s/ Michael P. Balaban Michael P. Balaban, Esq. | /s/ Anthony L. Martin Anthony L. Martin, Esq. | |
| 13 | 10726 Del Rudini St. | 3800 Howard Hughes Parkway, | |
| 14 | Las Vegas, NV 89141 Attorney for Plaintiff | Suite 1500 Las Vegas, NV 89169 | |
| 15 | Dated: September 9, 2019 | Attorney for Defendant | |
| 16 | | Dated: September 9, 2019 | |
| 17 | | | |
| 18 | | IT IS SO ORDERED. | |
| 19 | | IT IS SO ORDERED: | |
| 20 | | | |
| 21 22 | | UNITED STATES DISTRICT JUDGE | |
| 23 | | Dated: September 10, 2019. | |
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